

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JIHAD A. HACHEM, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

GENERAL ELECTRIC, INC., JEFFREY
R. IMMELT, JEFFREY S. BORNSTEIN,
and JOHN L. FLANNERY,

Defendants.

Case No. 1:17-cv-08457-JMF

**NOTICE OF NON-OPPOSITION BY MICHAEL SOMMA TO COMPETING MOTIONS
FOR APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF LEAD COUNSEL**

On January 2, 2018, pursuant to Section 21D of the Securities Exchange Act of 1934, 15 U.S.C. §78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), class member Michael Somma (“Movant”) filed a motion for, *inter alia*, his appointment as lead plaintiff in connection with the above-captioned securities fraud class action. Six similar motions were filed by other putative class members in these actions.

The PSLRA provides a presumption that the “most adequate plaintiff” to represent the interests of class members is the person or group that, among other things, has “the largest financial interest in the relief sought by the class.” §15 U.S.C. 78u-4(a)(3)(B)(iii)(I). Having reviewed the competing motions and supporting papers, it appears that movant Arkansas Teacher Retirement System possesses the “largest financial interest in the relief sought by the class,” as required by the PSLRA. In addition, Arkansas Teacher Retirement System appears to preliminarily satisfy the typicality and adequacy requirements of Rule 23 of the Federal Rules of Civil Procedure. *See* 15 U.S.C. §78u- 4(a)(3)(B). Accordingly, Movant supports the appointment of Arkansas Teacher Retirement System as Lead Plaintiff or the approval of its selection of Labaton Sucharow LLP as Lead Counsel for the Class.

By this Notice of Non-Opposition, Movant does not waive his rights to participate and recover as class members in this litigation, and he remains ready, willing and able to serve as lead plaintiff if the need arises.

Respectfully submitted,

DATED: January 12, 2018

GLANCY PRONGAY & MURRAY LLP

By: s/ Lesley F. Portnoy
Lesley F. Portnoy (LP-1941)
230 Park Ave., Suite 530
New York, NY 10169

Telephone: (212) 682-5340
Facsimile: (212) 884-0988
lportnoy@glancylaw.com

-and-

GLANCY PRONGAY & MURRAY LLP

Lionel Z. Glancy
Robert V. Prongay
Charles H. Linehan
1925 Century Park East, Suite 2100
Los Angeles, CA 90067
Telephone: (310) 201-9150
Facsimile: (310) 201-9160

*[Proposed] Lead Counsel for Movant
and the Class*

**PROOF OF SERVICE BY ELECTRONIC POSTING PURSUANT TO SOUTHERN
DISTRICT OF NEW YORK ECF AND LOCAL RULES AND BY MAIL ON ALL
KNOWN NON-REGISTERED PARTIES**

I, the undersigned say:

I am not a party to the above case and am over eighteen years old.

On January 12, 2018, I served true and correct copies of **NOTICE OF NON-
OPPOSITION BY MICHAEL SOMMA TO COMPETING MOTIONS FOR
APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF LEAD COUNSEL**, by
posting the document electronically to the ECF website of the United States District Court for
the Southern District of New York, for receipt electronically by the parties listed on the Court's
Service List.

I affirm under penalty of perjury under the laws of the United States of America that the
foregoing is true and correct. Executed on January 12, 2018 at Los Angeles, California.

s/ Lesley F. Portnoy
Lesley F. Portnoy

Mailing Information for a Case 1:17-cv-08457-JMF Hachem v. General Electric Inc. et al

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **Adam M. Apton**
aapton@zlk.com
- **Javier Bleichmar**
jbleichmar@bfalaw.com
- **Blake Thomas Denton**
blake.denton@lw.com,NY-CourtMail@lw.com,new-york-ma-2860@ecf.pacerpro.com,blake-denton-6659@ecf.pacerpro.com
- **Joseph Alexander Hood , II**
ahood@pomlaw.com,abarbosa@pomlaw.com
- **Christopher J. Keller**
ckeller@labaton.com,kgutierrez@labaton.com,drogers@labaton.com,ElectronicCaseFiling@labaton.com
- **Phillip C. Kim**
pkim@rosenlegal.com
- **Jeremy Alan Lieberman**
jalieberman@pomlaw.com,ahood@pomlaw.com,disaacson@pomlaw.com,abarbosa@pomlaw.com
- **Francis Paul McConville**
fmccconville@labaton.com,kgutierrez@labaton.com,jalayo@labaton.com,electroniccasefiling@labaton.com
- **Lesley Frank Portnoy**
LPortnoy@glancylaw.com,info@glancylaw.com
- **David Avi Rosenfeld**
drosenfeld@rgrdlaw.com,e_file_ny@rgrdlaw.com,e_file_sd@rgrdlaw.com
- **Miles Norman Ruthberg**
miles.ruthberg@lw.com,NY-CourtMail@lw.com,new-york-ma-2860@ecf.pacerpro.com,miles-ruthberg-2578@ecf.pacerpro.com
- **William J. Trach**
william.trach@lw.com,NY-CourtMail@lw.com,bj-trach-3344@ecf.pacerpro.com,new-york-ma-2860@ecf.pacerpro.com

Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)